

BEFORE THE
SHORELINES HEARINGS BOARD
STATE OF WASHINGTON

IN THE MATTER OF MURIEL RISK and)
CAMANO COVE COMMUNITY CLUB)
INC., a Washington Non-profit)
Corporation,)

Appellants,)

v.)

ISLAND COUNTY, a Washington)
Municipal Corporation, ISLAND)
SEA-FARMS, INC., STATE OF)
WASHINGTON, DEPARTMENT OF NATURAL)
RESOURCES, and DEPARTMENT OF)
ECOLOGY)

Respondents.)

SHB NOs. 86-49 & 86-50

FINAL FINDINGS OF FACT,
CONCLUSIONS OF LAW
AND ORDER

This matter, the request for review of the granting of a shoreline substantial development permit for a mussel long line facility, came on for hearing before the Shorelines Hearings Board, Lawrence J. Faulk, Chairman, and Wick Dufford, Judith A. Bendor, Nancy Burnett, Dennis McLerran, and Robert Schofield, Members, convened at Camano Island on April 6, and Mount Vernon on April 7, 8, and 9, 1987. Administrative Appeals Judge William A. Harrison presided.

1 Appellant Muriel Risk was represented by Jacob Cohen, Attorney at
2 Law. Appellant Camano Cove Community Club Inc., was represented by
3 Peter T. Jenkins, Attorney at Law. Respondent Island County was
4 represented by David L. Jamieson Jr., Deputy Prosecuting Attorney.
5 Respondent Island Sea-Farms, Inc. was represented by Dennis D.
6 Reynolds, Attorney at Law. Respondent Department of Natural Resources
7 was represented by Ann C. Essko, Assistant Attorney General.
8 Respondent Department of Ecology was represented by Allen T. Miller,
9 Assistant Attorney General. Reporter Leslie E. Kay recorded the
10 proceedings.

11 Witnesses were sworn and testified. Exhibits were examined. Oral
12 argument was heard and briefs submitted. Having heard the testimony
13 of witnesses, having examined exhibits, having considered the oral and
14 written argument of counsel, and being fully advised, the Shorelines
15 Hearings Board makes these

16 FINDINGS OF FACTS

17 I

18 This matter concerns aquaculture in the waters of Island County.
19 It concerns, specifically, a proposal to raise mussels artificially by
20 growing them on lines suspended in the water.

21 II

22 Recent years have seen increased numbers of proposals for
23 aquaculture in the waters of Puget Sound and adjacent marine waters.
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25
26 FINAL FINDINGS OF FACT
27 CONCLUSIONS OF LAW AND ORDER
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III

Island County, like other counties with marine waters, has amended its shoreline master program to plan for and evaluate the increasing number of aquaculture proposals. Unlike other counties, however, Island County chose to adopt "aquaculture districts." Each aquaculture district has discrete boundaries which are published on an official map. Each aquaculture district is planned for certain listed types of aquaculture. See Island County Aquaculture Districts Map, R-18 on this record. The theory behind Island County's districts is to select aquaculture sites at the "planning level." Other counties leave more latitude for the applicant to select a site then emphasize the "permit process." All counties employ both planning and permit procedures, however.

IV

In June, 1985, Island County's aquaculture amendments, approved by Department of Ecology, established an aquaculture district of 60 acres in Saratoga Passage off the western shore of Camano Island. Known as aquaculture district "1A", this is located some 435 feet offshore (200 feet at extreme low tide) of the lands owned by appellant, Muriel Risk. About 800-1,000 feet northeast of the district there are residential areas. The closest of these is the Camano Cove area whose residents are also appellants in this matter. The Camano Cove area is composed largely of summer beach homes.

V

The lands of Muriel Risk total 502 acres with one mile of shoreline. Since 1934, those lands have been operated as the Cama Beach resort. Some 1,400 feet southeast of aquaculture district 1A are 62 buildings, mostly summer cabins, which comprise the developed portion of Cama Beach resort. No less important to its visitors, however, is the undeveloped beach of the resort opposite which the aquaculture district was located. Up to 400 people per day visit the Cama Beach Resort in the summer. The undeveloped beach of the resort is a popular attraction for guests of the resort.

VI

Aquaculture district "1A" is located in shorelines of statewide significance. The district is subdivided into 12 tracts of 5 acres each. This district is approved for rafts, floating cages, long lines, or submerged cages for the production of abalone, algae, clams, mussels, oysters, salmon, trout, or scallops. See Island County Aquaculture Districts Map, supra.

VII

Within any aquaculture district, aquaculture is deemed a "primary use" under the Island County Shoreline Master Program (ICSMP). ICSMP, Section 16.21.035(F)(1), Use Requirements, Aquatic Designation, page 6.

VIII

The following rule for primary uses applies to aquaculture within aquaculture districts:

1 Applicants for Substantial Development will have
2 no burden of proof in regards to appropriateness
3 of a primary use; HOWEVER, a primary use must
4 comply with the Use Requirements specified in
this chapter 16.21 for the particular type of
development in question.

5 ICSMP, Section 16.21.135(D)(1), Use Requirements, Responsibility
6 of Applicant, page 28.

7 IX

8 The use requirements applicable to aquaculture are listed in the
9 ICSMP at Section 16.21.055 at pp. 9, 10, 11, and 12. These consist
10 of 18 enumerated requirements. Within these requirements there are
11 standards which address navigation (no.1), disposal of aquaculture
12 wastes (no.3), marking to Coast Guard standards (no.4), predator
13 control (no.14), maintenance (no.15), and a number of other
14 subjects. Although no. 15 requires a clean and orderly development,
15 there is no use requirement which addresses the effect of a proposed
16 development upon a scenic view or its aesthetic impact.

17 X

18 On February 28, 1986, respondent Island Sea-Farms applied to
19 Island County for a shoreline substantial development permit to
20 locate a mussel culture facility occupying one of the 12 five-acre
21 tracts in aquaculture district 1A. The proposed development is a
22 "long-line" facility. It would consist of 9 "lines". Each line is
23 actually two ropes running parallel for 200 feet. These are joined
24 by float barrels, at intervals, so that the lines are maintained on
25 the surface. There are 15 three-foot long float barrels for each

1 line, and these therefore total 135. The barrels protrude some 18"
2 above the water. The entire long line layout occupies about two
3 acres of surface. The lines are secured to the bottom with 2,500
4 pound concrete anchors. Culture lines are suspended downward into
5 the water from the long lines. These culture lines are composed of
6 mesh, and it is on these that the mussels are grown. Blue mussel
7 seeds will be brought to the site and planted on the mesh. Annual
8 harvest is estimated to be 100,000 pounds annually at peak
9 production. The mussels would be cleaned and processed away from
10 the site at a location on the north end of Camano Island. The
11 operations at the site involve accessing the site two or three days
12 a week in a 30 foot boat outfitted for maintaining, seeding and
13 harvesting mussels.

14 XI

15 On April 16 and 23, 1986, Island County published notice of
16 Island Sea-Farms shoreline application in the Stanwood/Camano News,
17 a legal newspaper of general circulation within the area where the
18 development is proposed. Notice of the application was mailed to
19 record owners of 44 properties on the shore near the aquaculture
20 district. This mailing included notice to the appellants in this
21 matter. Island County also posted notice of the application at four
22 sites along West Camano Drive, a public roadway near the site.

23 XII

24 On April 10, 1986, Island County issued its Determination of
25

1 Nonsignificance (DNS) for the proposed mussel raising development.
2 Notice of the DNS was sent to the State Departments of Ecology,
3 Fisheries, Natural Resources, and Game as well as the record owners
4 of the 44 properties along the shore which included the appellants
5 in this matter.
6

7 XIII

8 On July 1, 1986, the Hearings Examiner for Island County entered
9 Findings, Conclusions, and Decision granting a shoreline substantial
10 development permit for the mussel facility proposed by Island
11 Sea-Farms. This permit was approved subject to the following 14
12 conditions:

13 1. That the proposed project be located within
14 Tract 1 of Saratoga Passage Aquaculture District
15 1A.

16 2. That upon siting of the approved structures
17 the applicant provide the Island County Planning
18 Department with a statement, signed by a
19 registered surveyor, that the structures have
20 been installed within the tracts and in the
21 agreed upon positions.

22 3. That upon request by the Washington Depart-
23 ment of Fisheries, the applicant enter into any
24 monitoring efforts determined to be necessary to
25 assess the effects of mussel culture on site
26 and the effects of waste disposal.

27 4. That in the event adverse impacts are
identified and associated with the disposal of
waste the applicant agrees to abide by the waste
disposal method deemed most appropriate by
the Washington State Department of Fisheries and
Island County.

5. That the proposed project be marked in
accordance with U.S. Coast Guard requirements.

6. That the permit not be transferred to a new owner without prior notice to the County.
7. That properly installed anchoring systems be checked semi-annually to assure safety and soundness with a report made to the County.
8. That predator control not involve the killing of birds or mammals. That any form of predator control have prior approval of the Island County Planning Department.
9. That noise shall be kept to a minimum and in all cases comply with the State Noise Standards. The applicant shall be required to maintain normal working hours of 7 a.m. to 8 p.m.
10. That all commercial activity which shall take place in connection with this proposal at the applicant's property on the north end of Camano Island (which is claimed in this application to be the access site), be reviewed for zoning compliance by the Island County Planning Department, and if necessary brought into compliance with existing codes.
11. No working platform other than service vessel be used in the mussel operation.
12. That the floating aquaculture structures be operated and maintained in a clean, orderly and sound manner to control odor and avoid a messy, haphazard, or dilapidated appearance. This includes an annual check of the bottom and intertidal area and removal of any and all man-made debris that may have accumulated there.
13. That proof of all Federal, including a Corps of Engineers Section 10 Permit, State and Local Permits, and a Washington State Department of Social and Health Services water quality certification be provided to the County prior to project operation.
14. Applicant shall visit the site no more than three times a week, during weekdays only, for pickup of lines in addition to visits necessary for inspection, maintenance, and

1 repairs. No processing of harvested mussels or
2 waste disposal shall take place on site within
District 1A.

3 XIV

4 The Hearing Examiner for Island County concluded at no. 5
5 (page 5):

6 The issue of scenic values was also addressed
7 through the districting process.

8 XV

9 The Island County Board of County Commissioners, on October 13,
10 1986, approved the Findings, Conclusions and Decision of the Hearing
11 Examiner granting the permit in question. Appellants herein filed
12 requests for review by this Board on October 31 and November 13, 1986.

13 XVI

14 On the same date that it approved of this permit, October 13,
15 1986, the Board of County Commissioners adopted a moratorium on the
16 receipt, processing, and approval of new applications within this
17 aquaculture district 1A and others in Saratoga Passage. This
18 moratorium was based upon a finding that information received after
19 establishment of district 1A and others indicates that a conflict may
20 exist with pre-existing uses. Prior to this moratorium, Island County
21 had received applications for shoreline permits to allow salmon net pen
22 development within all the remaining tracts of aquaculture district 1A;
23 that is, 11 tracts as opposed to the 1 tract affected by this mussel
24 proposal.

XVII

The evidence before us can be classified into 3 major subject headings: 1) biological effect of the proposal; 2) effect of the proposal on navigation and related uses; and 3) aesthetic effect of the proposal. We now turn our consideration to each of these.

XVIII

Biological Effect. The proposed mussel production would generate solid waste in the form of feces, psuedo-feces (material which has been filtered from the water by the mussel, but not ingested), and mussel shells which fall from the facility. Unlike salmon net pen operations there will be no artificial feeding of the mussels to further contribute to this solid waste. No chemicals or nutrient additions would be used to enhance growth. The degree of sedimentation of waste that will accumulate on the bottom is not expected to be great, given the water depths and currents. The effect on the benthos and to non-mobile aquatic life will be minimal and will be confined to an area directly below the mussels. Significant degradation of water quality is not likely, though there will be some elevated ammonia levels downstream and these would be far below toxic levels. It is unlikely that the proposal would have any significant adverse effect upon surrounding wild stocks of fish, crab, land animals, or birds.

XIX

Navigation and Related Uses. The concern for navigation and related uses which is raised by appellants centers on four kinds of navigation:

FINAL FINDINGS OF FACT
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1 1. Tow Boats. The width of Saratoga Passage at the site in
2 question is approximately two miles, of which the proposal would occupy
3 less than 500 feet. In addition, the proposal would be located
4 landward of a line connecting headlands above and below it. Therefore,
5 towboat traffic would not be materially affected in normal weather.
6 Under certain adverse wind or current situations, log tows may follow a
7 course which hugs the shoreline. During such conditions the addition
8 of the mussel culture facility may cause log tows to move further into
9 the channel to avoid the two acre facility. Should winds cause tow
10 boats to seek refuge close to shore, it is probable that a Captain
11 aware of the proposal could avoid it even in those circumstances. Tow
12 boats would be warned of the proposal by two navigation lights on the
13 waterward corners of the long line grid. These lights would warn
14 boaters that anchoring exists. The applicant has also agreed to
15 install radar reflectors to provide additional warning.

16 2. Gillnet Fishing. The site is within an area where gillnet
17 fishing occurs, but there is no evidence on this record regarding the
18 comparative productivity of this site as opposed to any other site in
19 Washington waters. The same findings made with regard to tow boat
20 navigation are applicable to gillnet fishing. The proposal would
21 minimally displace this type of fishing without significantly impairing
22 it. The applicant has proposed flat anchors rather than fluked
23 anchors, and this anchoring would be less likely to snag a gillnet
24 which might come into contact.

3. Commercial Crab Harvesting. There is some dispute as to whether the proposal would attract or repel crabs. However, there is no evidence to indicate that this mobile species will become significantly more mobile because of the proposal. The proposal would minimally displace commercial crab harvesting by excluding the crabbing from its location. The proposal would not significantly impair commercial crab harvesting.

4. Recreational Boating and Fishing. There is adequate passageway between the proposal and the shore for recreational boating and fishing. There is also adequate passageway through the site for some oar powered boats during good weather. The boat ramp at Camano Island State Park is not in sufficiently close proximity to cause conflict between it and the proposal. The proposal would leave ample waters to support the enjoyable pursuit of both boating and fishing.

In summary, the proposed development, occupying merely two surface acres, would not significantly hamper navigation and related activities.

XX

Aesthetics. The proposed mussel long line development would be a relatively unobtrusive presence within the view and would not block or reduce the view. The applicant would use barrels of a greenish blue color to further cause the two acre proposal to blend with its surroundings. It will not be invisible. Nor do we find that the

1 absence of buildings on the nearby shore of Cama Beach resort indicates
2 that the area is uninhabited and suitable for intensive aquaculture.
3 To the contrary, the Cama Beach resort represents a highly inhabited
4 summer recreation ground purposely preserved in its natural state for
5 the enjoyment of its guests. We find only that this particular mussel
6 development is sufficiently unobtrusive to have no significant, adverse
7 aesthetic effect upon the views from shore, recognizing that it is a
8 view valued and enjoyed by many.

9 XXI

10 Any Conclusion of Law hereinafter determined to be a Finding of
11 Fact is hereby adopted as such.

12 From these Facts, the Board come to these

13 CONCLUSIONS OF LAW

14 I

15 The issues in this matter concern the consistency of the proposed
16 development with the State Environmental Policy Act (SEPA), the Island
17 County Shoreline Master Program (ICSMP), and the Shoreline Management
18 Act (SMA).

19 II

20 SEPA Determination of Nonsignificance. Appellants contend that
21 the determination of nonsignificance (DNS) does not comply with SEPA.
22 We disagree. The environmental checklist itself evidences actual
23 consideration of environmental factors. San Juan County v. DNR, 28 Wn.
24 App. 796, 801 (1981). The checklist was not deficient for failing to
25

1 consider the pending salmon pen applications under the theory that this
2 mussel proposal would serve as precedent for future actions. See, WAC
3 197-11-060(4)(d). There is too little factual similarity between this
4 mussel proposal and a salmon net pen proposal to regard the former as
5 precedent for the latter. We conclude that the DNS was not shown to be
6 erroneous, nor was it shown that notice of the DNS was inadequate.

7 III

8 SMA and ICSMP Notice of Application. Notice of an application for
9 a shoreline substantial development permit shall be given in the
10 following manner:

11 (4) The local government shall require
12 notification of the public of all applications
13 for permits governed by any permit system
14 established pursuant to subsection (3) of this
15 section by ensuring that:

16 a) A notice of such an application is
17 published at least once a week on the same day
18 of the week for two consecutive weeks in a
19 legal newspaper of general circulation within
20 the area in which the development is proposed;
21 and

22 (b) Additional notice of such an application
23 is given by at least one of the following
24 methods:

25 (i) Mailing of the notice to the latest
26 recorded real property owners as shown by the
27 records of the county assessor within at least
three hundred feet of the boundary of the
property upon which the substantial development
is proposed;

(ii) Posting of the notice in a conspicuous
manner on the property upon which the project
is to be constructed; or

1 (iii) Any other manner deemed appropriate by
2 local authorities to accomplish the objective
3 of reasonable notice to adjacent landowners and
4 the public.

RCW 90.58.140(4) and ICSMP 16.20A.050.

5 Island County complied with the newspaper publication requirement
6 (subsection a.). Moreover, by mailing notice to shoreline property
7 owners of record, including appellants, and by posting, Island
8 County complied with subsection b(iii). Although the marine
9 location of the site inhibited literal compliance with the 300 foot
10 rule for mailing (subsection b(i)) and the on site rule for posting
11 (subsection b(ii)) the spirit of these requirements was fully met.
12 As the subsection b methods are disjunctive alternatives, the key to
13 Island County's compliance is that it gave reasonable notice to
14 adjacent landowners and the public in accordance with subsection
15 (b)(iii). We conclude that notice of the shoreline permit
16 application was consistent with the SMA and ICSMP.

17 IV

18 Consistency of the ICSMP Aquaculture Districts with the Shoreline
19 Management Act. Appellants present a threshold issue as to the
20 consistency of the Island County aquaculture districts with the
21 Shoreline Management Act. We noted jurisdiction of this issue in
22 our Order Dismissing and Retaining Issues entered March 18, 1987.

23 The thrust of appellants' argument in this area is that the
24 aquaculture districting system in Island County results in a

1 pre-determination of approval for this proposed mussel facility and
2 other aquacultural proposals. With one reservation, which we will
3 emphasize below, we disagree.

4
5 V

6 One who proposes aquaculture in an Island County district "has no
7 burden of proof in regards to appropriateness of a primary use" such
8 as aquaculture. ICSMP, Section 16.21.135(D)(1). (See p.28, Finding
9 of Fact VIII, above). This planning arrangement is consistent with
10 the Shoreline Management Act to the extent that it merely means "the
11 general use of aquaculture" is permitted. (See, Island County
12 Brief, p.9 at lines 10-14). The applicant still must prove that the
13 specific proposed development is consistent with the ICSMP "Use
14 Requirements." ICSMP, Section 16.21.055. (See, Island County
15 Brief, p.9, lines 22-24).

16 VI

17 We conclude, however, as urged by appellants, that these ICSMP
18 Use Requirements are incomplete in that the enumerated 18 rules do
19 not address the aesthetic effect of a proposed aquaculture
20 development. Moreover, the ICSMP was applied in a manner which was
21 inconsistent with the Act when the finding was entered and adopted
22 by Island County that the issue of scenic values was addressed
23 through the districting system. That impermissably pre-determined
24 the issue of scenic and aesthetic values at the planning stage.
25 This is in conflict with the Act's requirements that the

1 environmental effect of specific proposed developments will be
2 scrutinized at the permit stage. RCW 90.58.020 and RCW 90.58.140
3 (2) (b). See also, SAVE v. Bothell, SHB No. 82-29 (1983).

4 VII

5 Despite the above, our own review of the aesthetic impacts of
6 this proposal convinces us that Island County reached the correct
7 result in granting the permit in this instance. The aesthetic
8 impact of this mussel proposal, when viewed at the permit stage, is
9 not inconsistent with the SMA. We employ as our standard, in this
10 regard, RCW 90.58.020 which states:

11 Permitted uses in the shorelines of the state
12 shall be designed and conducted in a manner to
13 minimize, insofar as practical, any resultant
14 damage to the ecology and environment of the
15 shoreline area and any interference with the
16 public's use of the water.

17 See Sato v. City of Olympia, SHB 81-41 (1982) regarding the
18 applicability of this standard to aesthetic concerns.
19 Notwithstanding the absence of an aesthetic use requirement within
20 the ICSMP, each separate aquaculture proposal must be consistent
21 with the above provision of the SMA so far as aesthetics are
22 concerned. This determination must be made during the permitting,
23 not the planning stage.

24 VIII

25 We conclude that the Island County aquaculture districts are
26 consistent with the SMA so long as not applied in any manner which

1 dispenses with a showing by the applicant, at the permit stage, that
2 the specific aquaculture development being proposed is consistent
3 with the SMA and ICSMP.

4 IX

5 Ensuing proposals for aquaculture in district 1A may raise
6 concerns similar to those raised here because the site would be
7 essentially the same as would the competing uses and view of the
8 site. We would therefore note for the guidance of the parties that
9 the evidence in this matter leads us to doubt that significantly
10 more aquaculture in 1A would prove consistent with the SMA and ICSMP
11 Use Regulations.

12 X

13 The proposed development is consistent with the preferences of
14 the ICSMP and SMA for shorelines of state wide significance. The
15 proposal recognizes state wide over local interest by contributing
16 to the statewide production of food. It largely preserves the
17 natural character of the shoreline, and would result in the long
18 term benefit of food production with minimal environmental impact.
19 Under these circumstances, aquaculture is a desired and preferred
20 water-dependent use of this shoreline of state wide significance.

21 XI

22 The proposed development meets the requirements of both the
23 Shoreline Management Act and Island County Shoreline Master Program
24

1 provided that the 14 conditions imposed by Island County are
2 retained and the following added:

3 1. The proposed development shall have radar reflectors at its
4 waterward two corners.

5 2. All barrels, buoys, and other items protruding from the water
6 shall be bluish-green in color to blend with water surroundings.

7 3. No methods shall be used to control predators which has the
8 potential to, or does in fact, injure them.

9 4. Flat, not fluked, anchors shall be used.

10 5. Processing of harvested mussels and disposal of processing
11 wastes shall occur on land.

12 6. Five years from the initiation of operation, Island County
13 shall review and determine the consistency of the operation with
14 this permit.

15 Each condition above is supported by the evidence before us, and
16 each is necessary to conform to proposal with the SMA and ICSMP.

17 XII

18 The parties, after hearing, have offered and objected to a permit
19 granted by the US Army Corps of Engineers for this proposal.
20 (Exhibit R-30). Because we cannot adjudicate the finality of that
21 permit, which apparently is in dispute, we decline to admit either
22 the exhibit or the disagreements which it entails. Those will be
23 resolved by the Corps of Engineers.

XIII

We have carefully reviewed the other claims raised by appellants and find them to be without merit.

XIV

Any Finding of Fact which is deemed a Conclusion of Law is hereby adopted as such.

From these Conclusions, the Board enters this

ORDER

The shoreline substantial development permit granted by Island County is remanded for issuance in the same form as previously granted but with addition of the conditions enumerated in Conclusion of Law XI hereof. As so amended, the permit is affirmed.

DONE at Lacey, Washington this 25th day of September, 1987.

SHORELINES HEARING BOARD

Lawrence N. Faudk 9/25/87
LAWRENCE N. FAUDK, Chairman

Wick Dufford
WICK DUFFORD, Member

[see Partial Concurring Opinion]
JUDITH A. BENDOR, Member

Nancy Burnett
NANCY BURNETT, Member

Dennis J. McLerran
DENNIS McLERRAN, Member

[see Partial Concurring Opinion]
ROBERT SCHOFIELD, Member

William A. Harrison
WILLIAM A. HARRISON
Administration Appeals
Judge

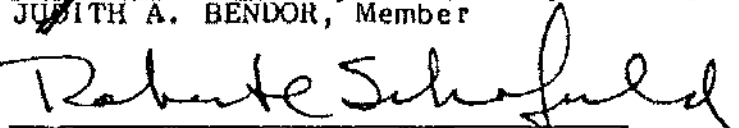
1 BENDOR and SCHOFIELD
2 Partial Concurring Opinion

3 We concur in the judgment and join in the majority opinion, except
4 as to "Conclusion of Law" IX. Our colleagues conjecture about
5 potential future shorelines appeals, ones not currently before this
6 Board. Such language is pure dicta, not necessary to the Board's
7 conclusion that a conditioned shoreline substantial development permit
8 should issue in this instance for a two-acre mussel aquaculture
9 proposal.

10 Questions may exist whether future shoreline permit applications
11 might be consistent with the Shoreline Management Act or the Island
12 County Shoreline Management Program. Such questions clearly remain
13 for another day's resolution, for other parties to pose and to attempt
14 to answer -- for that is the essence of our system. Rains v. State,
15 100 Wn.2d 660, 674 P.2d 165 (1983).
16

17 SHORELINES HEARINGS BOARD

18 
19 JUDITH A. BENDOR, Member

20 
21 ROBERT C. SCHOFIELD, Member